

**AMENDMENTS TO THE DRAWINGS**

Annotated marked-up drawings are attached to show proposed drawing changes.

Replacement sheets incorporating such changes are also attached.

Attachment: Replacement Sheet(s)  
Annotated Sheet Showing Changes

**REMARKS/ARGUMENTS**

Reconsideration of this application is respectfully requested.

As required in the outstanding Action, proposed drawing changes are hereby requested so as to explicitly use reference numbers 32A, 32B, etc. in Fig. 2. It will be appreciated that Fig. 2 depicts the border routers 16A and 16B -- and that such routers are identical in substance such that their various portions have the same numerical reference numerals but carrying the suffix A if associated with border router 16A and the suffix B if associated with the border router 16B. Accordingly, the drawings and specification are now believed to be in agreement and in compliance with 37 C.F.R. §1.84.

In response to the rejection of claims 1-18 and 21 under 35 U.S.C. §112, second paragraph, the claims have been reviewed and amended to put them into more traditional U.S. format and obviate the Examiner's stated grounds of objection.

The rejection of claims 1-18 and 21 under 35 U.S.C. §103 as allegedly being made "obvious" based on Tsuchiya '669 in view of Watanuki '986 is respectfully traversed.

EP 0 840 482 corresponding to Tsuchiya was already taken into account in the international stage of this application which gave rise to the currently pending claims that were found to have novelty and inventive step in the IPER dated 28 December 2001. Although the Notice of Acceptance dated April 29, 2002 acknowledges receipt of the IPER, another copy is attached hereto for the Examiner's convenience.

There are many known ways of handling IPv4 to IPv6 translation and some of these are acknowledged in the introduction of the specification at page 2, lines 1 to 4 with a more detailed explanation following to page 3, line 14. What the present invention addresses is the problem of getting messages (which may have been converted by any of these methods) to another

destination which may not be equipped to handle the conversion in the same way. Thus, regardless of the conversion method used, the present invention can still handle the transmission between domain types by considering the destination address to determine its format and handling the message either by use of the protocol converter or by encapsulation of the message with a derived second type address.

Using the method of the present invention thus overcomes problems which can be created by a single conversion method such as those described by Tsuchiya and/or Watanuki which individually cannot sort out messages handled using the other's format conversion method.

Thus while many have attempted to solve the problem of transferring messages between networks using differing address protocols (or across networks using different protocols to the sending and receiving networks) none have previously created a "universal" solution to this problem which is not adversely affected by the protocol or encapsulation message used for delivery to the interface.

Neither of the cited references sets out to provide this universal solution and creating the combination proposed by the Examiner would require considerable inventive effort even if the skilled artisan had both specifications at hand. Importantly, it is noted that the Examiner has failed to identify any teaching in either of the cited references that could have "suggested" the combination now being proposed by the Examiner in hindsight.

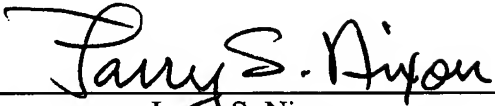
In accordance with the admitted fundamental deficiencies of both cited references noted above, it is not believed necessary at this time to explain the additional deficiencies of a more detailed nature with respect to the independent and/or dependent claims now pending.

Accordingly, this entire application is now believed to be in allowable condition and a formal notice to that effect is respectfully solicited.

HOVELL et al  
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Respectfully submitted,

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ANNOTATED MARKED UP DRAWINGS  
FOR SN 10/069,359

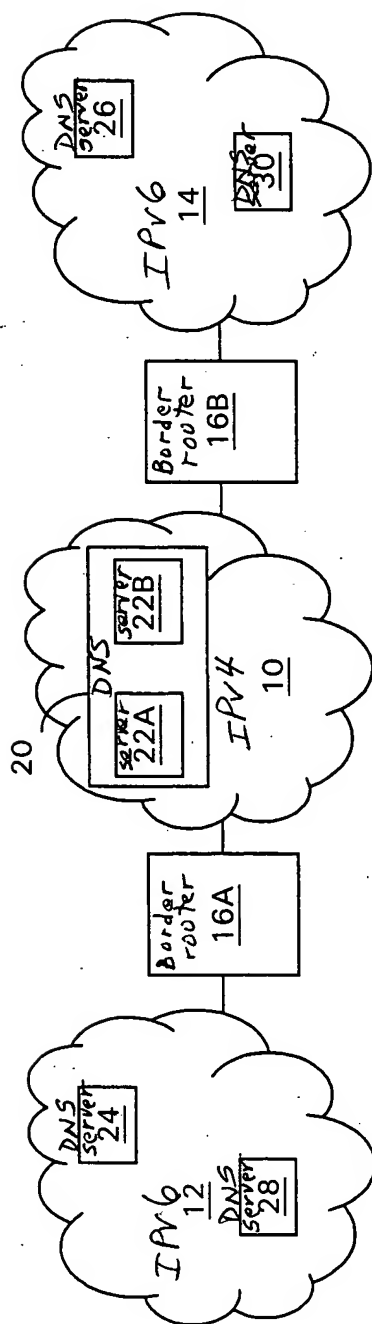


Fig. 1

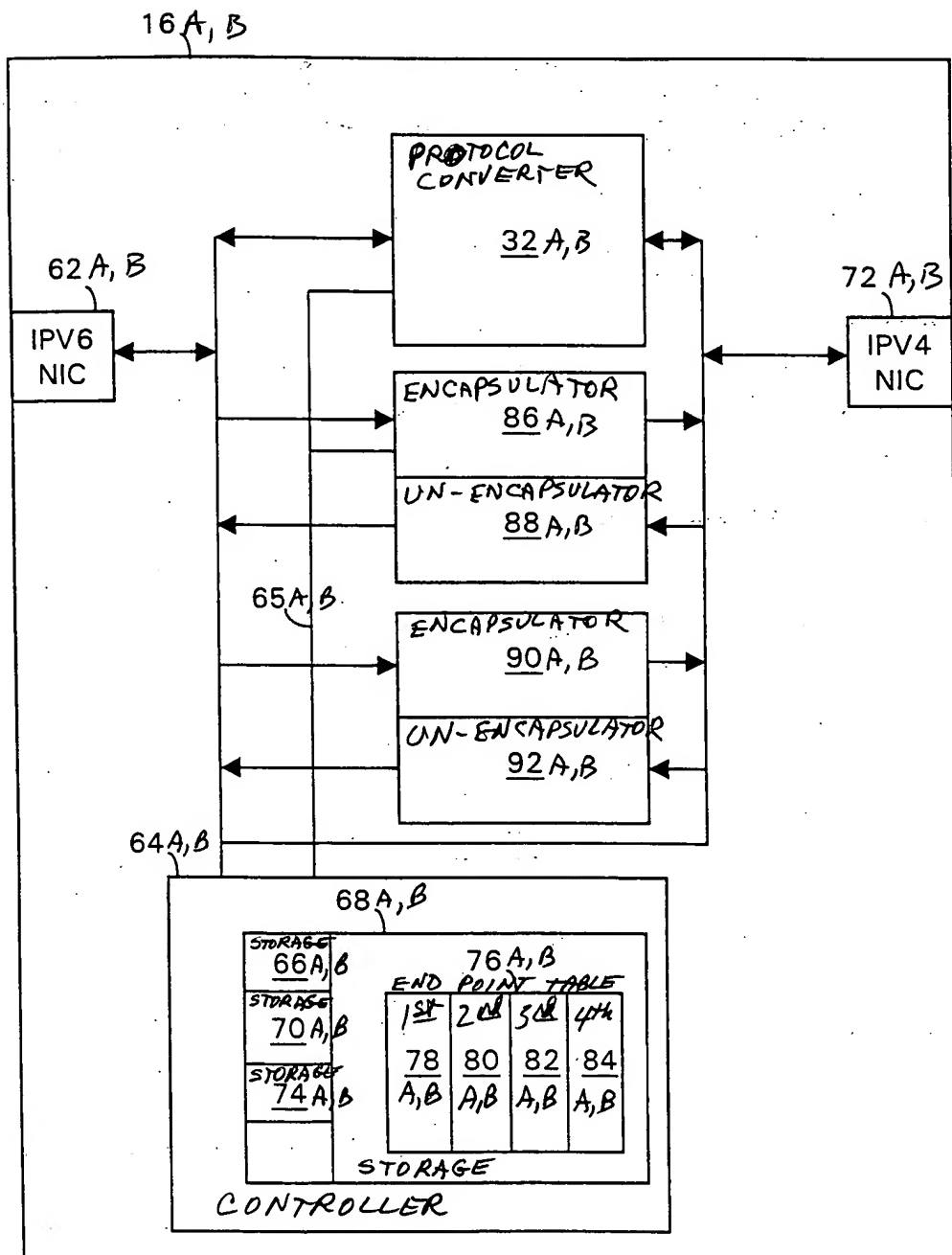


Fig. 2